

December 14, 2008

Ms. Carole Davis, Nutrition Promotion Staff Director  
Co-Executive Secretary of the Dietary Guidelines Advisory Committee  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

Dear Ms. Davis:

I am writing in response to the request for public comment regarding the *2010 Dietary Guidelines for Americans*. As both a nutrition educator working in low-income communities for the past five years and a graduate student studying food policy at the Tufts Friedman School of Nutrition Science and Policy, I have firsthand experience understanding the complexities surrounding how to educate individuals about creating a healthy diet, and deeply appreciate the opportunity to provide feedback.

Despite the availability of sound nutrition advice to the public, consumers are constantly bombarded with confusing, vague and often clashing messages regarding the benefits of food products lining store shelves. Various symbols from checkmarks to hearts can be found on packaging in the grocery store proclaiming solutions to health problems facing our nation. However, in the midst of all of this messaging, consumers continue to gain weight and battle preventable chronic diseases associated with overweight and obesity.

The inclusion of nutrient density as a core concept in the *2005 Dietary Guidelines* was an excellent step towards helping individuals make wise choices within the food groups. However, as noted in the research recommendations of the *2005* Advisory Committee's final report, there is still need for a "scientifically valid definition for 'nutrient density' that could be useful on the food label." The current definition states:

Nutrient dense foods are those that provide substantial amounts of vitamins and minerals and relatively fewer calories. Foods that are low in nutrient density are foods that supply calories but relatively small amounts of micronutrients.<sup>i</sup>

In order to promote a diet that is more aligned with the recommendations outlined in the *Dietary Guidelines*, the revised definition of nutrient density should account not only for its general micronutrient composition, but also for fiber. Additionally, the definition should clearly state that nutrient density is a tool for comparing foods within the same food group. Meanwhile the *Guidelines* should continue to advocate balance between the food groups while encouraging added consumption of fruits, vegetables, whole grains and nonfat & low-fat dairy.

The *2010 Dietary Guidelines* will come at a pivotal time when new health messages in the form of front-of-package labeling will also be hitting the market to help consumers assess the most nutrient-dense options available to them.<sup>ii</sup> There is an ongoing effort throughout government to create a tool that consumers can utilize to help them understand how nutrient density will inform a better diet and lead to improved health outcomes. The USDA has created partnerships under the Nutrition Education and Promotion Program to define nutrient density, further marketing research, and create a concept that will help drive consumer decisions. Congress has recommended that by 2009 one front-of-package icon be available for all foods.

The advisory committee is in a unique position to clearly define nutrient density and help translate the concept into a useful tool that will score foods for the general public. Numerous scoring systems have been formulated in the past few years by individual food manufactures, retailers and independent organizations; each with their own agenda, influences and unique approach. If left to the market, consumers will see more mixed messages in the coming years as different stores use varying systems. Packages could say one thing, while shelf tags proclaim another, with differences from store to store, leaving consumers overwhelmed. While intended enable consumers to make educated purchasing decisions, these dueling scoring systems will could have a harmful effect, causing consumers confusion and frustration.

What the nation needs is one comprehensive score that is trustworthy, transparent and based on the same scientific evidence that informs the *Dietary Guidelines* available to all food manufactures and retailers. I recommend that the advisory committee either author its own nutrient scoring system or endorse a system that uses the *Dietary Guidelines* for its labeling criteria, such as the Smart Choices Program. This system should positively evaluate a food based on its composition of beneficial nutrients. Extra focus should be placed on the nutrients to encourage for all populations, as outlined in the *Dietary Guidelines*. These include calcium, potassium, fiber, magnesium, iron, folic acid, vitamins A, B-12, C, E, and D. Meanwhile, the score should negatively assess nutrients to limit, such as saturated fat, trans fatty acids, added sugars and sodium. Additionally, the system must be adaptable and updated to reflect revisions of the *Dietary Guidelines* every five years.

Finally, the *Dietary Guidelines* should advise consumers and health practitioners on how to interpret, or be critical of, other front-of-package health claims including recommendations from health organizations, individual manufacturers, retailers, and other overall scoring systems. Consumers should not only have access to a reliable tool to make healthy shopping easier, they should also be empowered to shop with an educated and critical eye as they make their purchasing decisions.

A market-wide nutrient density scoring system supported by the *Dietary Guidelines* will ideally lead to healthier choices made by consumers and healthier products manufactured by food companies. In order to promote adherence to the *Dietary Guidelines*, I recommend that the advisory committee focus on clearly defining nutrient density and turning it into an actionable concept that can create a trustworthy, transparent score that all Americans can utilize to improve dietary intake and health nationwide.

I commend the Advisory Committee's service to improving the nutritional intake of our nation. Thank you for your time and for the opportunity to provide comments as the Committee formulates its report.

Sincerely,

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<sup>i</sup> US Department of Health and Human Services & US Department of Agriculture. *Dietary Guidelines for Americans 2005*. Online at: [http://www.cdc.gov/nchs/about/major/nhanes/nhanes2003-2004/nhanes03\\_04.htm](http://www.cdc.gov/nchs/about/major/nhanes/nhanes2003-2004/nhanes03_04.htm).

<sup>ii</sup> Smart Choices Program website. Online at: [www.smartchoicesprogram.com](http://www.smartchoicesprogram.com).